

Casey B. Howard
Samantha Ingram
LOCKE LORD LLP
3 World Financial Center
New York, New York 10281-2101
Phone: (212) 415-8600
Fax: (212) 812-8398
choward@lockelord.com
singram@lockelord.com
*Attorneys for Defendants Citibank, N.A. and
The Student Loan Corporation*

**UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF NEW YORK**

Lesley Campbell,

Plaintiff,

v.

Citibank, N.A.; The Student Loan
Corporation; Square Two Financial,
Inc.; CACH, LLC; and First Step Group,
LLC,

Defendants.

Case No. 14-45990 (CEC)
Chapter 7

Adv. Pro. No. 15-01038 (CEC)

**DECLARATION OF ROBERT CARSON IN SUPPORT OF DEFENDANTS' MOTION
TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

Robert Carson hereby makes the following declaration under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an Assistant Vice President for Citibank, N.A. ("Citibank"). I am authorized by Citibank to make this Declaration in support of Defendants Citibank, N.A. and The Student Loan Corporation's Motion to Dismiss the Amended Complaint filed by Plaintiff Lesley Campbell (the "Motion") in the above captioned adversary proceeding. I am over 21 years of age, and I suffer from no legal disability.

2. Citibank maintains a computer database (the “Student Loan Records”) of acts, transactions, payments, communications, account activity and disbursements with respect to student loans owned and/or originated by Citibank. The information described herein and referenced below is found in the business records of Citibank. The entries in those records are made at the time of the events and conditions they describe occurred, either by people with first-hand knowledge of those events and conditions or from information provided by people with such first-hand knowledge. I have access to the Student Loan Records with respect to the subject loan, and have knowledge of how they are maintained. Based upon those records, I have gained knowledge of the facts set forth herein and, if called upon as a witness to testify, could and would competently testify as to those facts, under penalty of perjury.

3. Citibank was the lender on a student loan made to Plaintiff Lesley Campbell (“Plaintiff”) identified by the loan number *****751498063020 (first 6 digits of the loan number are deleted) (the “Student Loan”).

4. On or about April 19, 2009, Plaintiff completed the CitiAssist Bar Exam Loan Online application (the “Loan Application”), which was transmitted by electronic means to Citibank. A true and correct copy of the Loan Application is attached hereto as Exhibit A.

5. The Loan Application expressly incorporated the terms of the Master Student Loan Promissory Note in favor of Citibank (the “Promissory Note”) in connection with the Student Loan. A true and correct copy of the Promissory Note is attached hereto as Exhibit B.

6. Citibank conditionally approved the Loan Application and provided Plaintiff, by electronic means, with a letter indicating the same (the “Conditional Approval Letter”), A true and correct copy of the Conditional Approval Letter is attached hereto as Exhibit C.

7. On 04/20/2009, Citibank verified Plaintiff's academic status with Pace University School of Law.

8. On 04/22/2009, Citibank remitted \$15,000.00 to Plaintiff, subject to the Promissory Note.

9. In December 2013, (the "Transfer Date") the Student Loan was transferred to Square Two Financial, Inc.

10. As of the Transfer Date, Citibank ceased to hold any interest in the Student Loan.

Dated: October 2, 2015
Sioux Falls, South Dakota

Citibank, N.A.



By: Robert Carson

Title: Assistant Vice President

CERTIFICATE OF SERVICE

I, SAMANTHA INGRAM, an attorney, hereby certify that on this 5th day of October, 2015, a true and correct copy of the foregoing *Declaration of Robert Carson in Support of Defendants' Motion to Dismiss Plaintiff's Amended Complaint*, and all exhibits thereto, were served via ECF upon all parties registered to receive service via ECF in this case.

/s/ Samantha Ingram
Samantha Ingram